CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

INTERNAL MEMORANDUM

cc: H. E. Lewin

H. Schweich

P. Tandler

D. Durham G. Perschbacher

T. Cornwell /

B. Ottofy

HQ-10 SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

> File: EPA - RCRA

DATE: 11-5-81

J. Johnson FROM:

SUBJECT: Hazardous Waste Inspection - 11-5-81

On November 4, 1981, Ms. Dianne Spencer of the Illinois EPA called and requested a visit on 11/5/81 for the purpose of reviewing our records and storage of hazardous waste as required under the Resource Conservation and Recovery Act (RCRA).

She arrived at 10:30 a.m. November 5 and reviewed the manifest file maintained in D. Durham's office.

She viewed the storage of 14 dated drums (earliest date 9/23/81 latest date 10/29/81) located in the designated area at the south end of the Mill. These were acceptable. She wanted to know when we tagged the drums. Ms. Spencer was advised that the material was pumped into a tank truck and no tag was needed.

She asked to see our contingency plans and records of training personnel to implement the plan. Ms. Spencer was shown Bake Ottofy's memo to P. Tandler dated April 10, 1981, on the contingency plan. She said it was acceptable.

Ms. Spencer was advised that our training had been confined to a small group of trainers and because of multiple responsibility the training had yet to be completed. She was advised that this would be completed by year end.

She indicated our training record should cover an outline of the training, who was trained, what is their title, job description, and when they were trained.

This program must be updated annually.

Ms. Spencer advised that Cerro had made excellent progress since her March visit and that we should be in good shape when our contingency plan was implemented.

Ms. Spencer advised that the regulation had been revised in July, 1981. The revisions did not affect Cerro as a generator.

Meeting concluded at 11:30 a.m.

Jun Johnson